

# Morgan Lewis

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April 11, 2022

## VIA ECF

Hon. Analisa Torres  
United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Courtroom 15D  
New York, NY 10007-1312

**Re: Paguada v. Rowan, Inc., Case No. 22-cv-1846-AT**  
**Request to Extend Defendant's Time to Respond to the Complaint**

Dear Judge Torres:

We represent Defendant Rowan, Inc. in the above-referenced action. Pursuant to Your Honor's Individual Practices in Civil Cases, we write with the consent of counsel for Plaintiff Dilenia Paguada respectfully to request that the Court extend Defendant's time to respond to the Complaint from April 15, 2022 to May 6, 2022. This is Defendant's first request for an extension of time to respond to the Complaint. In support of this request, counsel for Defendant states that we were recently engaged in this matter, and this extension, if granted, will permit us to become more familiar with the relevant facts and allegations. As noted above, Plaintiff's counsel consents to this request. If granted, this request will not affect any other dates scheduled in this action.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

*/s/ Michael F. Fleming*

Michael F. Fleming

C: All Counsel of Record (via ECF)

GRANTED.

SO ORDERED.

Dated: April 13, 2022  
New York, New York



ANALISA TORRES  
United States District Judge